

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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| REVIEW OF FEDERAL COMMUNICATIONS |) | |
| COMMISSION'S TRIENNIAL REVIEW ORDER |) | CASE NO. 2003-00379 |
| REGARDING UNBUNDLING REQUIREMENTS |) | |
| FOR INDIVIDUAL NETWORK ELEMENTS |) | FILED: December 16, 2003 |

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
(GENERAL AND SPECIFIC) OBJECTIONS TO
AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S
SECOND SET OF INTERROGATORIES AND
SECOND REQUESTS FOR PRODUCTION OF DOCUMENTS**

BellSouth Telecommunications, Inc. ("BellSouth") hereby files the following General and Specific Objections to AT&T of the South Central States, LLC's ("AT&T") Second Set of Interrogatories and Second Requests for Production of Documents, dated November 24, 2003.

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as BellSouth prepares its answers to the above-referenced interrogatories and request for production of documents, BellSouth reserves the right to supplement, revise, or modify its objections at the time it serves its responses.

GENERAL OBJECTIONS

1. BellSouth objects to the interrogatories and requests for production to the extent they seek to impose an obligation on BellSouth to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such interrogatories and requests for production are overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Specifically, AT&T defines BellSouth to include, in relevant part, "parents, subsidiaries, and affiliates . . ." BellSouth

will not be responding to discovery that seeks information from parent and affiliate companies.

2. BellSouth objects to the interrogatories and requests for production to the extent they are intended to apply to matters other than those subject to the jurisdiction of the Commission. BellSouth objects to such interrogatories and requests for production as being irrelevant, overly broad, unduly burdensome, and oppressive.

3. BellSouth objects to each and every interrogatory and request for production and instruction to the extent that such request or instruction calls for information that is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.

4. BellSouth objects to each and every interrogatory and request for production insofar as the interrogatories and requests are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these interrogatories and requests for production. Any answers provided by BellSouth in response to the interrogatories and requests for production will be provided subject to, and without waiver of, the foregoing objection.

5. BellSouth objects to each and every interrogatory and request for production insofar as it is not reasonably calculated to lead to the discovery of admissible evidence and are not relevant to the subject matter of this action. BellSouth will attempt to note in its responses each instance where this objection applies.

6. BellSouth objects to providing information to the extent that such information is already in the public record before the Commission.

7. BellSouth objects to AT&T's discovery requests, instructions and definitions, insofar as they seek to impose obligations on BellSouth that exceed the requirements of the Kentucky Rules of Civil Procedure or Kentucky Law.

8. BellSouth objects to each and every interrogatory and request for production, insofar as any of them are unduly burdensome, expensive, oppressive, or excessively time consuming as written.

9. BellSouth is a large corporation with employees located in many different locations in Kentucky and in other states. In the course of its business, BellSouth creates countless documents that are not subject to Commission or FCC retention of records requirements. These documents are kept in numerous locations that are frequently moved from site to site as employees change jobs or as the business is reorganized. Therefore, it is possible that not every document has been identified in response to these requests. BellSouth will conduct a search of those files that are reasonably expected to contain the requested information. To the extent that the requests purport to require more, BellSouth objects on the grounds that compliance would impose an undue burden or expense.

10. BellSouth objects to each and every interrogatory and request for production to the extent that the information requested constitutes "trade secrets". To the extent that AT&T requests proprietary confidential business information, BellSouth will make such information available in accordance with a protective agreement, subject to any other general or specific objections contained herein. other general or specific objections contained herein.

11. BellSouth objects to any discovery request that seeks to obtain “all” of particular documents, items, or information to the extent that such requests are overly broad and unduly burdensome. Any answers provided by BellSouth in response to this discovery will be provided subject to, and without waiver of, the foregoing objection.

SPECIFIC OBJECTIONS TO SECOND SET OF INTERROGATORIES

Interrogatory Item No. 119: For each switch located within the central offices identified in response to Interrogatory No. 1, provide the following information:

- (a) the percentage of originating calls completed to other subscribers on the switch (intra-office calls);
- (b) the percentage of originating calls completed to other "local" subscribers (inter-office local calls);
- (c) the percentage of originating calls competed to intra-LATA toll destinations (intra-LATA toll calls); and
- (d) the percentage of originating calls competed to inter-LATA toll destinations, a single total percentage:
 - (i) Inter-LATA, intra-state plus;
 - (ii) Inter-LATA inter-state plus; and
 - (iii) International (inter-LATA toll calls).

OBJECTION: BellSouth objects to Interrogatory No. 119 on the grounds that it is overly broad, unduly burdensome, and oppressive. BellSouth estimates that responding to this Interrogatory would require BellSouth to pull 96,000 records and there is no existing program in place to pull this data. Consequently, to retrieve this data, BellSouth would have to develop specific software at an estimated cost of tens of thousands of dollars.

SPECIFIC OBJECTIONS TO SECOND REQUESTS FOR PRODUCTION

Request for Production No. 35: Provide a copy of the most recent non-recurring cost studies conducted in BellSouth's nine-state region, including all associated detailed work activity descriptions and work times, for pricing a hot cut order coordination – specified conversion time, for a SL-1 loop. Show work activity descriptions and work times separately for each of the associated work groups:

- (a) customer Wholesale Interconnection Network Services (CWINS) Center;
- (b) central office (CO) Frame Attendant;
- (c) central office Electronic Technician; and

(d) other Central Office Personnel, if any.

OBJECTION: BellSouth objects to Interrogatory No. 35 to the extent it seeks information that is already a matter of public record before this or another commission or is otherwise readily accessible to AT&T through publicly available means. BellSouth also objects to this Interrogatory to the extent it seeks information that is already in AT&T's possession, custody, or control.

Respectfully submitted this 16th day of December, 2003.

BELLSOUTH TELECOMMUNICATIONS, INC.


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